

Womble Bond Dickinson (US) LLP

1221 Main Street Suite 1600 Columbia, SC 29201

t: 803.454.6504

Belton T. Zeigler

Partner

Direct Dial: 803-454-7720 Direct Fax: 803-381-9120

E-mail: Belton.Zeigler@wbd-us.com

September 21, 2021

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd Chief Clerk/Administrator Public Service Commission of South Carolina 101 Executive Center Drive Columbia, South Carolina 29210

Re: Docket No. 2021-9-E, Dominion Energy South Carolina, Incorporated's 2021 Integrated Resource Plan (IRP) (See also Docket No. 2019-226-E)

Dear Ms. Boyd:

I am writing on behalf of Dominion Energy South Carolina, Inc. ("DESC") regarding the Joint Motion filed by Ms. Mixson on behalf of South Carolina Coastal Conservation League and the Southern Alliance for Clean Energy, Sierra Club, and Carolinas Clean Energy Business Association, in which DESC did not join. DESC respectfully requests that the Commission deny that motion and adopt the schedule that DESC proposed in its letter of August 27, 2021, in this docket. That requested schedule is not materially different from the schedule proposed by Ms. Mixson.

DESC regrets that it was impossible to provide the Commission with a consent order as directed. At the hearing in this matter, Commissioner Ervin instructed Ms. Mixson "to draft a proposed order for the other attorneys to consent to if they are *all in agreement with [the] proposed schedule.*" (emphasis added). He specifically sought a return that would provide the Commission with "something that we know everyone has agreed upon."

While there is no material difference between the parties concerning the schedule, consensus on a proposed order failed due to the insistence by CCL/SACE on including a provisions acknowledging a right for parties to request a hearing in IRP update proceedings. As Commissioner Ervin recognized, this is not an issue that needs to be reached at this time since it

is possible that "all parties could be satisfied with the final result and there'd be no need for a hearing."

DESC believes that the approach taken by CCL/SACE in preparing and presenting its joint motion was inconsistent with Commissioner Ervin's directions to CCL/SACE for the reasons which are set forth in DESC's email to Ms. Mixson which is attached.

For the reasons articulated at the hearing in this matter, DESC respectfully requests that the Commission deny the joint motion and adopt a schedule for submission of comments only.

Respectfully submitted,

/s/Belton T. Zeigler Womble Bond Dickinson (US) LLP 1221 Main Street, Suite 1600 Columbia, SC 29201 (803) 454-7720 belton.zeigler@wbd-us.com

Attorney for Dominion Energy South Carolina, Inc.

cc: All counsel of record